

Law Offices of Colin Mulholland

Employment and Civil Litigation

30-97 Steinway Street.
Suite 301-A
Astoria, NY 11103

Telephone: (347) 687-2019
cmulhollandesq@gmail.com

December 1st, 2022

Honorable Lorna G. Schofield
United States District Judge
40 Foley Square
New York, NY 10007

Re: Jeronimo v. Disfruta Products, LLC, 22-cv-4166 (LGS)

Your Honor,

The parties jointly respectfully request that the Court amend its Order of Dismissal to explicitly state that the matter has been dismissed ‘with prejudice’, or, in the alternative, the re-open the case.

The parties had contemplated in Section 2 of their Agreement that the Court’s Order of Dismissal would explicitly state that the matter was dismissed with prejudice.

The parties would respectfully submit along with this motion a proposed Stipulation and Order of Dismissal tracking the existing Order. In light of the full execution of the Agreement with Confessions, the extended payment plan and the Court’s declining to retain jurisdiction, the parties would jointly consent to omitting a 30-day restoration provision in any amended Order of Dismissal.

Dated: December 1, 2022

/s/Colin Mulholland, Esq.
Colin Mulholland, Esq.
30-97 Steinway, Ste. 301-A
Astoria, New York 11103
Telephone: (347) 687-2019
Attorney for Plaintiff